

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

INTERNATIONAL PARTNERS FOR
ETHICAL CARE, INC., et al.,

Plaintiffs,

v.

JAY INSLEE, Governor of Washington,
et al.,

Defendants.

NO. 3:23-cv-05736-DGE

STIPULATED MOTION AND
[PROPOSED] ORDER TO SET
BRIEFING SCHEDULE AND
WORD LIMITS

NOTE ON MOTION CALENDAR:
November 13, 2023

STIPULATED MOTION

Pursuant to Federal Rule of Civil Procedure 6(b), and Local Civil Rules 7(d)(1) and 10(g), the parties to the above-captioned case have stipulated to and jointly request the Court's approval of a briefing schedule for Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint, with expanded word limits, and in support thereof, state as follows:

1. Plaintiffs filed their Complaint (Dkt. #1), and Defendants responded with their Motion to Dismiss (Dkt. #30). Pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiffs filed their First Amended Complaint (Dkt. #34). Their First Amended Complaint raises challenges to two additional state laws under a variety of constitutional theories.

2. The undersigned counsel for the parties have conferred and agreed upon a briefing schedule and word limits for Defendants' forthcoming Motion to Dismiss Plaintiffs' First Amended Complaint.

- i. Defendants' Motion to Dismiss due December 15, 2023, maximum of 11,000 words;
- ii. Plaintiffs' Opposition to Motion to Dismiss due January 19, 2024, maximum of 11,000 words; and
- iii. Defendants' Reply in Support of Motion to Dismiss due February 2, 2024, maximum of 5,500 words.

3. The request for additional time and words is based on the number of issues raised against three state laws in the First Amended Complaint, and the desire to minimize competing briefing deadlines and the press of Thanksgiving and other end-of-year holiday leave and plans. Preparation of the briefs, as well as consultation between counsel and their clients, will be delayed or impeded by such leave and plans.

4. All parties agree that the proposed modified schedule best accommodates each of their respective interests and time constraints. Moreover, the minor delay will not require any greater expenditure of the Court's time or resources and will allow all parties to effectively brief their respective positions.

The parties respectfully request the Court grant their Stipulated Motion.

It is SO AGREED this 13th day of November, 2023.

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Counsel for Plaintiffs

[PROPOSED] ORDER

Having reviewed the foregoing stipulated motion and good cause appearing therefore,
IT IS HEREBY ORDERED:

The following briefing schedule shall govern the resolution of Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint:

EVENT	FILING DEADLINE	WORD COUNT LIMIT
Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint	December 15, 2023	11,000 words
Plaintiffs' Opposition to Defendants' Motion to Dismiss	January 19, 2023	11,000 words
Defendants' Reply to Motion to Dismiss	February 2, 2023	5,500 words

IT IS SO ORDERED.

DATED this _____ day of _____ 2023.

The Honorable David G. Estudillo
U.S. DISTRICT COURT CHIEF JUDGE